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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA)	NO. CR 15-CR 319-001 RS
)	
v.)	UNITED STATES' OPPOSITION TO
)	DEFENDANT'S MOTION FOR EARLY
SHAUN W. BRIDGES)	TERMINATION OF ELECTRONIC MONITORING
(A/K/A "NUMBER 13"),)	
)	
Defendant.)	
)	
)	

The United States, through its undersigned attorneys, hereby opposes the motion filed by defendant Shaun W. Bridges for early termination of electronic monitoring.

1 On January 25, 2016, Defendant filed his motion seeking early termination of the court-ordered
2 electronic monitoring on the eve of his reporting deadline to the Federal Correctional Institution, Berlin,
3 New Hampshire (FCI Berlin) as directed by the Bureau of Prisons (BOP). Dkt. No. 111. Said motion is
4 predicated upon the fact that Bridges has been ordered by the BOP to report to FCI Berlin by noon on
5 Friday, January 29, 2016, and that wearing the electronic monitor would complicate his travel to the
6 facility and that it could not be completed in a single day. This is simply not the case. Moreover, the
7 reasons for the electronic monitoring are not diminished¹ because Bridges is now on the eve of serving
8 his 71-month sentence.

9 Bridges claims that transportation by car from his home in Maryland to FCI Berlin would take
10 approximately 10 hours and that, as such, he could not make the trip in a single day. However, nothing
11 would prevent Bridges from leaving Maryland in the early morning hours of January 29 which would
12 allow him to arrive at FCI Berlin by noon. Moreover, Bridges could always travel to FCI Berlin the day
13 before and report in late on the afternoon/evening of January 28.

14 Defendant Bridges also claims that wearing the electronic monitoring bracelet at the time he
15 reports to prison to begin serving his sentence could complicate the process as the prison personnel may
16 not be familiar with the bracelet and how to remove it. That is also not the case. Indeed, the
17 undersigned counsel has learned from Warden Esker Tatum at FCI Berlin that the personnel at FCI
18 Berlin are familiar with and can assist with the removal of the electronic monitoring bracelet when
19 Bridges reports to the facility.

20 Finally, there is more reason than ever for the United States to be concerned about Bridges'
21 possible flight prior to his report date on January 29, 2016. As the Court will recall, the United States
22 sought to have Bridges remanded into custody both at his plea hearing and again at his sentencing given
23 repeated conduct by Bridges, which indicated that he was a flight risk. Such conduct included repeated
24 attempts to change his name and social security number and to have such information shielded from law
25 enforcement. This and other conduct by Bridges led the Court to seriously consider the government's
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27 ¹ The government sought Bridges' remand to custody and for the reasons adduced at the
28 sentencing and change of plea hearing, the government continues to believe that the defendant should be
remanded instead of voluntarily surrendering.

1 request to remand Bridges into custody; however, the court ultimately declined to do so, instead, placing
2 further restrictive release conditions upon Bridges. Since that time Bridges has also filed a motion for
3 the return of his passport – a motion that was denied by the Court. Dkt. No. 107. The concerns which
4 led the government to seek Bridges’ remand are still present and are even more acute today given that
5 his report date is imminent and that Bridges’ movements would be unmonitored for two days prior to his
6 reporting deadline at FCI Berlin should the court grant Bridges’ motion. Now is simply not the time to
7 remove Bridges’ electronic monitoring.

8 For the reasons stated above, the United States respectfully requests that the Court deny the
9 subject motion.

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11 DATED: January 26, 2016

Respectfully submitted,

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14
15 /s/
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